PROTECTING PEOPLE AND ASSETS

Mar 19, 2013

Dr. Rashmi Doshi
Chief, Laboratory Division
Office of Engineering and Technology
Federal Communications Commission
Washington, D.C, 20554

Re: Proceeding Number 13-49, Part 15 revision to permit U-NII devices in the 5 GHz Band

Dear Dr. Rashmi,

Enterprise Electronics Corporation (EEC), an Alabama based and registered company was incorporated in 1971 specifically for the manufacture of affordable, high quality weather radar systems for the world market. EEC has been in business for over 40 years with more than 1,000 radar systems manufactured and delivered in the United States and over 90 countries worldwide. In 1974 EEC delivered 160 S-band weather radars to the US National Weather Service (NWS) prior to the NEXRAD network upgrade in 1988. EEC also designed, manufactured and delivered the first commercial Doppler weather radar in 1981 and, the first commercial Dual Polarization weather radar in 2005. Examples of EEC's products and capabilities may be found at (www.eecradar.com).

EEC recognizes the need to expand the use of the 5GHz spectrum for the U-NII devices by doing so in a technologically responsible manner. EEC strongly supports the use of technology to ensure these devices do not interfere with the primary users, such as our domestic customers, or the very similar, US government TDWR installations. It's important to note that many of our customers in broadcast television, small regional airports and municipalities depend on their weather radar systems to deliver the very same consistent quality of data expected from the government TDWR installations.

EEC is confident that industry will provide the innovative technical solutions necessary to ensure, to the greatest degree possible, the unlicensed devices will not interfere with these primary users of the spectrum. However, we do strongly recommend the use of an industry supported geo-location data base containing *all* primary users of the spectrum (that volunteer the information), including commercial weather radar installations and the government TDWR installations. While this may be the intent, it was not clear that the proposed data base contained more than the TDWR information (as it does now). We believe that making this information available to the wireless industry and, subsequent reference to the information has substantial potential to prevent interference to the primary users from occurring, regardless of strengths or weaknesses of the technology-based mitigation techniques.

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VP Research & Innovation

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